



SCOTT FITZPATRICK
MISSOURI STATE TREASURER

INVESTMENT POLICY

I. AUTHORITY

The Constitution and statutes of the State of Missouri authorize the Missouri State Treasurer to have custody of all state monies and to invest said monies not needed for the daily operations of the State. The Treasurer has assigned responsibility for the day-to-day administration of this policy to the Director of Investments.

II. INVESTMENT COMMITTEE

The State Treasurer's Office Investment Committee shall be responsible for developing and reviewing the investment process of the State Treasurer's Office within the framework provided by the Constitution and statutes of the State of Missouri. The State Treasurer's Office Investment Committee shall set and monitor policies, set general strategies, and implement necessary monitoring mechanisms.

The Committee will meet regularly to review performance, policy, procedures and legislation.

Members of the Committee include:

- State Treasurer
- Director of Investments – Chair
- Director of Banking
- Deputy State Treasurer

III. PRUDENCE

All participants in the investment process shall act responsibly as custodians of the public trust. The standard of prudence to be applied by the personnel of the Investment Division is the "prudent investor" rule, which states, "Investments shall be made with judgment and care, under circumstances then prevailing, which persons of prudence, discretion and intelligence exercise in the management of their own affairs, not for speculation, but for investment, considering the probable safety of their capital as well as the probable income to be derived."

IV. ETHICS AND CONFLICT OF INTEREST

Personnel involved in the investment process shall refrain from personal business activity that could create an appearance of impropriety, conflict with proper execution of the investment program, or impair their ability to make impartial investment decisions. Employees and investment officials shall disclose to the Treasurer any material financial interests in financial institutions that conduct business within Missouri, and they shall further disclose any large personal financial/investment positions that could be related to the performance of the portfolio. Employees and officers shall refrain from undertaking personal investment transactions with the same individual or entity with which business is conducted on behalf of the State of Missouri.

V. DELEGATION OF AUTHORITY

Authority and responsibility for the management and operation of the investment program is hereby delegated to the Director of Investments, who shall act in accordance with the established written procedures and internal controls for the operation of the investment program consistent with this investment policy. Only the Director of Investments, Deputy State Treasurer, Investment Analyst, and Investment Coordinator positions are authorized to make investments and to order the receipt and delivery of investment securities among custodial security clearance accounts. The Director of Investments will be responsible for all transactions undertaken and shall establish a system of controls to regulate the activities of subordinate staff.

VI. OBJECTIVES

The primary objectives of investment activities shall be legality, safety, liquidity, yield and the provision of a capital base for statewide economic development.

➤ Legality

The State Treasurer's Office will invest the state's excess funds only within the legal guidelines set forth by the Constitution and statutes of the State of Missouri. Any investment alternative outside these guidelines is not permissible.

Furthermore, the State Treasurer's Office seeks to promote and support the objectives of U.S. foreign policy regarding terrorism. Accordingly, investments in companies, including their subsidiaries or affiliated entities (collectively, a "Company" or "Companies"), that are known to sponsor, hold or transfer the funds of, or service in any way any group or state engaging in terrorism, or aid the governments in countries that are known to sponsor terrorism, are prohibited. Additionally, the State Treasurer's Office will not invest in Companies having material operations in U.S.-designated state sponsors of terrorism. Should the State Treasurer's Office discover that it holds an investment in such Company, or that such an investment is held on its behalf, the State Treasurer's Office shall immediately divest of such investment.

➤ Safety

Safety of principal is the primary objective of the investment program. Investments shall be undertaken in a manner that seeks to ensure the preservation of capital in the overall portfolio. The objective will be to mitigate credit risk and interest rate risk.

A. Credit Risk

The State Treasurer's Office will minimize credit risk, the risk of loss due to the failure of the security issuer or backer, by:

- Establishing a pre-approved list of financial institutions and companies that the State Treasurer's Office will be restricted to when purchasing commercial paper.
- Conducting regular credit monitoring and due diligence of these issuers.
- Pre-qualifying the financial institutions and broker/dealers with which the State Treasurer's Office will do business for broker services and repurchase agreements.
- Diversifying the portfolio so potential losses on individual securities will be minimized.

B. Interest Rate Risk

The State Treasurer's Office will minimize the risk that the market value of securities in the portfolio will fall due to changes in general interest rates, by:

- Maintaining an effective duration of less than 2.5
- Holding at least 25% of the portfolio's total market value in securities with a maturity of 12 months or less

➤ Liquidity

The investment portfolio will remain sufficiently liquid to meet all reasonably anticipated operating requirements. This will be accomplished by structuring the portfolio so securities mature concurrent with cash necessary to meet anticipated demand. Furthermore, because all possible cash demands cannot be anticipated, the portfolio should consist largely of securities with active secondary or resale markets.

➤ Yield

The investment portfolio will be designed with the objective of attaining a market rate of return throughout budgetary and economic cycles, taking into account the investment risk constraints and liquidity needs. Return on investment is the least important objective.

➤ Provision of a Capital Base for Statewide Economic Development

The State Treasurer's Office will seek to promote Missouri's economic growth by placing funds on deposit with Missouri financial institutions and in eligible commercial paper and bankers' acceptances issued by Missouri-based companies and/or major employers within the State. As such, the State Treasurer's Office shall consider the overall benefits to the economy and welfare of the State and its citizens through the direct and secondary economic benefits of investments in Missouri. However, such investments will be subject to the same credit risk guidelines as all other investments, and investment staff will not be directed to purchase in-state commercial paper or other securities at lower yields than other securities within the same asset class.

The State Treasurer's Office will seek to enhance total portfolio return by means of active portfolio management. The prohibition of speculative investments precludes pursuit of gain or profit through unusual risk. However, trading in response to changes in market value or market direction is warranted under active portfolio management.

VII. PERFORMANCE

Active management should produce, over a period of time, book yields in excess of a low risk passive benchmark. For management purposes, and for Investment Committee review, both the book yield and total rate of return will be calculated for the portfolio and compared to the appropriate security market indexes as established by the Committee.

VIII. BROKER/DEALER REQUIREMENTS

Investments will be made through banks that have an IDC rating of 125 or above, or securities dealers, who have been approved by the Investment Committee. Such securities dealers and banks will have been subjected to an appropriate investigation by the staff of the State Treasurer's Office including, but not limited to, a review of the firm's financial statements and the background of the sales representative. All approved dealers must be fully licensed and registered FINRA Broker/Dealers or exempt banks. Criteria used to select securities dealers will include:

- Financial strength and capital adequacy of firm;
- Services provided by firm;
- Research services available;
- Resume, reputation and qualifications of sales representative;
- Due diligence and firm references; and,
- State government expertise.

IX. REPORTING

The Investment Division shall report monthly to the Investment Committee on the present status of the investment portfolio. Each monthly report will, at a minimum, include the following:

- The market value of the portfolio, including realized and unrealized gains or losses resulting from appreciation or depreciation.
- Average weighted yield to maturity and duration of all portfolios as compared to applicable benchmarks.
- Percentage of the total portfolio represented by each type of investment.
- The rating levels for commercial paper and bankers' acceptances. The investment division should also recommend to the committee if the commercial paper or bankers' acceptances should be held or sold in the event of a rating downgrade below the minimum acceptable rating levels set forth in the State Treasurer's Qualified Banks Policy.
- Listing of individual securities held at the end of the reporting period.
- The realized and unrealized gains or losses resulting from appreciation or depreciation by listing the cost and market value of securities over one-year duration in accordance with Government Accounting Standards Board (GASB) 31 requirements, reported annually.

X. PERMISSIBLE INVESTMENTS AND GUIDELINES

A. Investment Types

In accordance with, and subject to restrictions imposed by the Constitution and the laws of the State of Missouri, the following list represents the entire range of permissible investments.

1. Time Deposits

- a. Financial institutions with a physical location in the State of Missouri will be selected as depositories based on, but not limited to, the following: financial stability, funds availability, loan-to-deposit ratio, community involvement and other relevant economic criteria.
- b. Pursuant to state law, the maximum maturity of a deposit will be five years.
- c. The rate of interest to be earned on monies placed in time deposits with Missouri financial institutions will be determined pursuant to state law.
- d. A financial institution will be eligible to receive total deposits in an amount not to exceed their equity capital. The State Treasurer's Office may, from time to time, limit the dollar amount of deposits a financial institution may receive due to lack of availability. At no time shall the State Treasurer's Office deposit more than 10% of total general time deposits into any single financial institution.
- e. A financial institution's loan-to-deposit ratio must be in excess of 50% at the time of deposit unless a specific need can be shown by the financial institution for the funds.
- f. Time deposits (principal and interest) must be collateralized at least 100% with approved securities. The market value of all time deposit collateral will be reviewed on an ongoing, periodic basis to determine collateral adequacy.

2. Linked Deposits

- a. Financial institutions with a physical location in the State of Missouri will be selected based upon financial stability and funds availability, and must have an IDC rating of 125 or above.
- b. Maturity of the deposits will be based upon the statutes' language for maximum maturities of deposit, the borrower's needs, the liquidity requirements and interest rate risk considerations of the State Treasurer's Office along with any other relevant economic considerations. This can vary by category of linked deposits.
- c. The rate of interest to be charged follows the statute language regarding the loan rate to the borrower that is below the normal borrowing rate.
- d. The minimum and maximum amounts of the linked deposit to be placed in each category will be determined by the Investment Committee when these amounts are not specifically stated in the statutes.
- e. Linked deposits (principal and interest) must be collateralized at least 100% with approved securities. The market value of all linked deposit collateral will be reviewed on an ongoing, periodic basis to determine collateral adequacy.
- f. Additional Requirements for linked deposits can be found in Addendum A to this Investment Policy.

3. U. S. Treasury and Federal Agency Securities

- a. Treasury and Agency securities with final maturities of five years or less as stated in the statutes may be purchased.
- b. Treasury and Agency securities must be purchased through approved broker/dealers.
- c. Agency securities include those specific obligations referenced in (X. B.) that are issued or guaranteed by any agency or instrumentality of the United States Government.

4. Commercial Paper

- a. Commercial paper which has received the highest letter and numeral ranking (i.e., A1 / P1) by at least two nationally recognized statistical rating organizations (NRSRO's).
- b. Eligible paper is further limited to issuing corporations that have a total commercial paper program size in excess of \$250,000,000 and have long term debt ratings, if any, of "A" or better from at least one NRSRO.
- c. Purchases of commercial paper may not exceed 180 days to maturity.
- d. Approved commercial paper programs should provide some diversification by industry. Additionally, purchases of commercial paper

in industry sectors that may from time to time be subject to undue risk and potential illiquidity should be avoided.

- e. The only asset-backed commercial paper programs that are eligible for purchase are fully supported programs that provide adequate diversification by asset type (trade receivables, credit card receivables, auto loans, etc.) No securities arbitrage programs or commercial paper issued by Structured Investment Vehicles (SIV's) shall be considered.
- f. No more than 5% of the total market value of the portfolio may be invested in the commercial paper of any one issuer.

5. Bankers' Acceptances

- a. Definition - Bills of exchange or time drafts on and accepted by a commercial bank, otherwise known as bankers' acceptances.
- b. An issuing bank must have received the highest letter and numeral ranking (i.e., A1 / P1) by at least two nationally recognized statistical rating organizations (NRSRO's).
- c. Must be issued by domestic commercial banks
- d. Purchases of bankers' acceptances may not exceed 180 days to maturity.
- e. No more than 5% of the total market value of the portfolio may be invested in the bankers' acceptances of any one issuer.

6. Repurchase Agreements

- a. Repurchase agreements may be entered into for periods of 90 days or less.
- b. Repurchase agreements must be purchased through approved broker/dealers. All approved broker/dealers must have a signed Bond Market Association Master Repurchase Agreement on file with the State Treasurer's Office, and in the case of tri-party repurchase agreements, a tri-party agreement is also required.
- c. All collateral will either be delivered to the Treasurer's Account at the Federal Reserve Bank, or to an approved third party custodian.
- d. Repurchase agreements must be collateralized 102% with approved securities.
- e. No more than 15% of the total market value of the portfolio may be invested in repurchase agreements with any one issuer.

7. Reverse Repurchase Agreements

- a. Reverse repurchase agreements may be entered into for periods of 90 days or less.
- b. Reverse repurchase agreements must be executed through approved broker/dealers. The State Treasurer's Office will assign reverse repurchase agreement trading limits for each broker/dealer.
- c. All collateral will be delivered to dealers versus payment.

- d. Collateral will be priced at market plus accrued interest. All term trades will be reviewed weekly to determine pricing adequacy.
- e. The State Treasurer's Office will enter into reverse repurchase agreements only to cover unexpected shortcomings in the Treasurer's demand account.

B. Security Selection

The following list represents the entire range of United States Agency Securities that the Missouri State Treasurer will consider and which shall be authorized for the investment of funds. Additionally, the following definitions and guidelines will be used in purchasing the instruments:

1. U.S. Govt. Agency Coupon and Zero Coupon Securities. Bullet coupon bonds with no embedded options and with final maturities of five (5) years or less.
2. U.S. Govt. Agency Discount Notes. Purchased at a discount with a maximum maturity of one (1) year.
3. U.S. Govt. Agency Callable Securities. Restricted to securities callable at par or above with a final maturity of five (5) years or less.
4. U.S. Govt. Agency Step-Up and Step-Down Securities. The coupon rate is fixed for an initial term. At specific future rate reset dates, the coupon rate changes to a new pre-determined rate, for a specific period of time, restricted to securities with a final maturity of five (5) years or less.
5. U.S. Govt. Agency Floating Rate Securities. The coupon rate floats off one index and resets at least quarterly with a final maturity of five (5) years or less.
6. U.S. Govt. Agency Mortgage Backed Securities. Restricted to securities with stated final maturities of five (5) years or less.

C. Additional Investment Restrictions and Prohibited Transactions

To provide for the safety and liquidity of the Missouri State Treasurer's funds, the investment portfolio will be subject to the following restrictions in addition to those listed elsewhere in this policy:

1. Borrowing for investment purposes ("Leverage") is prohibited.
2. Instruments known as inverse floaters, leveraged floaters, equity-linked securities, option contracts, futures contracts and swaps are prohibited.
3. Contracting to sell securities not yet acquired in order to purchase other securities for purposes of speculating on developments or trends in the market is prohibited.

D. Collateralization

The State Treasurer's Office will maintain an Acceptable Collateral Policy, which will be consistent with the Constitution and Laws of the State of Missouri, and approved by the Governor, the State Treasurer, and the State Auditor. All deposits placed in financial institutions must be at least 100% collateralized with securities listed in this policy. The Investment Committee shall periodically review and may make changes to the collateralization margins for collateral asset classes based on changes in market conditions or other events.

All securities, which serve as collateral against the deposits of a depository institution, must be safekept at a non-affiliated custodial facility. Depository institutions pledging collateral against deposits must, in conjunction with the custodial agent, furnish the necessary custodial receipts. The Missouri State Treasurer must have a *depository contract and pledge agreement* with each safekeeping bank that will comply with the Financial Institutions, Reform, Recovery, and Enforcement Act of 1989 (FIRREA). This will ensure that the Missouri State Treasurer's security interest in collateral pledged to secure deposits is enforceable against the receiver of a failed financial institution.

E. Securities Lending

1. The Treasurer may temporarily exchange securities held in the portfolio for cash or other authorized securities of at least equal value with no maturity more than one year beyond the maturity of any of the traded obligations.
2. Securities lending may be transacted through the State Treasurer's Office custodial bank, through a third party lender, or directly with approved broker/dealers. Direct broker/dealers must have a signed Bond Market Association Securities Lending Agreement on file with the State Treasurer's Office.
3. All securities being transferred must be delivered versus payment.
4. Securities lending transactions may be entered into for periods of 90 days or less.
5. The Director of Investments shall develop collateral investment guidelines for the reinvestment of any collateral made by the State Treasurer's Office securities lending agent and is responsible for periodic monitoring of these investments for compliance.

XI. ASSET ALLOCATION

The investment portfolio will be diversified to minimize the risk of loss resulting from excess concentration into a specific maturity, issuer or class of securities. Diversification strategies will be implemented through a written asset allocation policy, which, at a minimum, outlines the minimum, maximum and target asset allocation by investment type. Target allocations indicate general objectives under steady market conditions; however targets may fluctuate throughout the year based on cash flows and market conditions. The asset allocation policy will be established and periodically reviewed by the State Treasurer's Office Investment Committee.

XII. SAFEKEEPING AND CUSTODY

All securities will be held by a third-party custodian designated by the Treasurer and evidenced by safekeeping receipts. All trades where applicable will be executed by delivery vs. payment (DVP) to ensure that securities are deposited in eligible financial institutions prior to the release of funds. All non-Fed eligible securities will be held at the Depository Trust Corporation through the State Treasurer's Office custodial account.

XIII. INTERNAL CONTROLS

The Treasurer has established a system of internal controls designed to prevent losses of public funds arising from fraud, employee error, misrepresentation by third parties, unanticipated changes in financial markets or imprudent actions by employees of the State Treasurer's Office. Controls deemed most important include: separation of duties, separation of transaction authority from accounting and record keeping, custodial safekeeping, clear delegation of authority, written confirmation of telephone transactions, minimizing the number of authorized investment officials, documentation of transaction strategies and a code of ethics.

XIV. ADOPTION OF POLICY

The Missouri State Treasurer adopted the initial investment policy in 1993. The policy was revised in accordance with Section 30.260 RSMo, (Senate Bill No. 449) in January 1998 and adopted by the State Treasurer's Office Investment Committee on January 5, 1998. The policy was last revised and adopted by the State Treasurer's Office Investment Committee on February 26, 2019.

In accordance with Section 30.260, RSMo, the Missouri State Treasurer shall present a copy of this policy to the Governor, Commissioner of Administration, State Auditor and General Assembly at the commencement of each regular session of the General Assembly or at any time the written investment policy is amended.



SCOTT FITZPATRICK
MISSOURI STATE TREASURER

Addendum A

Investment Policy Section X. A. 2.

Missouri Linked Deposit Program Additional Requirements

I. ADDITIONAL REQUIREMENTS

A. Section 30.753, RSMo., permits the STO to invest in Linked Deposits. All investments of state funds by the STO must be made pursuant to the written investment policy required by Mo. Const. Art. IV, Section 15, and further described in Section 30.260, RSMo. Therefore, in addition to meeting the relevant statutory requirements for eligibility contained within Sections 30.750 through 30.860, RSMo., applicants for participation in the Linked Deposit Program shall also be required to satisfy the following as requirements of the STO's Investment Policy:

1. Applicable to all applicants, regardless of type:
 - a. USPS address verification;
 - b. Does not currently owe any unpaid, non-protested taxes to Missouri or any political subdivision, and provides DOR Form 943 in order to obtain a tax clearance letter;
 - c. Owner criminal background check. An applicant is disqualified if any owner has: been found guilty of, pleaded guilty to, or otherwise been found responsible for a crime punishable as a felony in Missouri and/or a crime of moral turpitude; and/or if any owner is currently on probation or parole; and/or if any owner has a felony charge pending;
 - d. Current business registration with Missouri's Secretary of State;
 - e. Submit copies of all owners' Missouri driver licenses;
 - f. Completed Borrower's Certification form;
 - g. Certification of citizenship/immigration status and employer status;
 - h. Affidavit of Authorized Workers and enrollment in E-Verify (if applicant has employees, as defined and determined pursuant to Internal Revenue Service guidance and relevant case law); and,
 - i. Statement on structure of business operations.
2. Requirements specific to certain applicants. In addition to the statutory requirements, and those generally applicable Investment Policy requirements listed above, the following shall

be required of each applicant type listed below:

- a. Farming Operations Program: Projected farm income (not including spouse's income) must be greater than non-farm income.
 - b. Beginning Farmer Program: Borrower has adequate working capital and experience in the type of farming operation for which the loan is sought; Project shall be used only for farming by the borrower or borrower's immediate family; Projected farm income (not including spouse's income) must be greater than non-farm income; and, Must not own more acres than 50% of the average size farm in the county location.
 - c. Facility Borrower Program: Facility has no unresolved environmental compliance issues with DNR.
 - d. Alternative Energy Business Programs: Applicant has obtained necessary local and state regulatory approval for project; No unresolved environmental compliance issues with DNR; May be used for certain operating expenses (inventory; rent, utilities, insurance, taxes; professional fees; equipment purchase, rental or lease; renovations, repairs, maintenance of equipment or facilities; purchase of land or buildings.)
 - e. Alternative Energy Consumer Programs: Resident of Missouri at least 18 years of age; Project located in Missouri.
 - f. Job Enhancement: Borrowers shall commit to create the required jobs in the first year of the linked deposit and to retain those jobs throughout the life of the linked deposit. Failure to comply may result in the deposit being early matured, with the bank charged the increased interest rate on the deposit for all periods of non-compliance. Borrowers are required to provide documentation that establishes an instance of "retention" being an issue.
 - g. Local Governments: Must have received necessary approval from governing board to initiate project; Legally authorized to enter into a loan or lease-purchase agreement with a lender for project; All necessary permits related to the project have been obtained; and, Project complies with all applicable federal and state laws and regulations.
 - h. Small Business: No unresolved environmental compliance issues with DNR; and, may be used for certain operating expenses (inventory; rent, utilities, insurance, taxes; professional fees; equipment purchase, rental or lease; renovations, repairs, maintenance of equipment or facilities; purchase of land or buildings.)
- B. Financial institutions have six months from the date an application has been approved to request the placement of the deposit. If a linked deposit application is approved but not placed within 60 days after approval, then the application will be voided and due diligence procedures must be completed again. If a completed renewal application is not received within 60 days of the previous deposit maturity date, the application must go back through the standard approval process.
- C. Banks cannot "early mature" a linked deposit which was entered into on a multi-year fixed rate option, and then immediately re-apply for the same applicant, in order to take advantage of

increasing or decreasing interest and deposit rates.

- D. The following persons are prohibited from participating in the Missouri Linked Deposit Program: Any STO employee, including the State Treasurer; Members of the General Assembly; Statewide elected officials; Directors of state programs; Officers and members of the Linked Deposit Review Committee. This prohibition extends to the Immediate Family members of the persons listed above, as well as to partnerships, corporations, cooperatives and LLCs where any person listed above owns a 2% or more equity interest. ("Immediate family" includes parents, siblings, spouse, children.)
- E. No linked deposit shall exceed \$1 million.
- F. The State Treasurer's Office may, from time to time, limit the dollar amount of deposits a financial institution may receive due to lack of availability. At no time shall the State Treasurer's Office deposit more than 20% of the statutory cap set forth in Section 30.753.1, RSMo., into any single financial institution.
- G. No financial institution shall be allowed to refinance an existing bank loan for a linked deposit.
- H. Treasurer Fitzpatrick has determined that it is in the overall interest of the people of the state of Missouri and the general public welfare, pursuant to Section 30.260.3, RSMo., that the following types of entities be deemed ineligible for participation in the Missouri Linked Deposit Program. This list is not exhaustive, and does not prohibit or limit the State Treasurer's Office from rejecting Missouri Linked Deposit Program Applications for any other lawful reason.
- Firms involved in lending activities, such as banks, finance companies, factors, leasing companies, insurance companies (not agencies), and any other firm whose stock in trade is money.
 - Firms involved in speculative activities, which develop profits from fluctuations in price rather than through the normal course of trade, such as wildcatting for oil and dealing in commodities futures, when not part of the regular activities of the business.
 - Subsidiaries of businesses domiciled in a foreign country.
 - Real estate investment firms or holding companies, when the real property will be held solely for investment purposes. (These companies may qualify if they are organized for the purpose of renting or leasing property to an eligible underlying business and share a degree of common ownership with the underlying business, as determined on a case-by-case basis. These restrictions do not apply to Linked Deposit Multi-Family Housing applicants.)
 - Pyramid sales plans, where a participant's primary incentive is based on the sales made by an ever increasing number of participants.
 - Gaming or gambling businesses, but does not include businesses obtaining less than one-third of their gross income from participation in the State Lottery.
 - Private clubs and businesses, which limit the number of members for reasons other than capacity.
 - Entities offering live performances, products, or services of a prurient sexual nature.

- Businesses that have previously defaulted on a linked deposit loan, or state or federally assisted financing.
- Businesses primarily engaged in political or lobbying activities.
- Firms involved in illegal activity.
- Businesses where an owner has pleaded guilty to or been found guilty of, or is currently incarcerated or on parole for, a felony or a crime of moral turpitude; businesses where an owner is currently facing charges for a felony or a crime of moral turpitude; or businesses where an owner is currently on probation for any crime.